

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Certification of)	MB 04-64
Digital Transmission Content Protection)	
("DTCP") for Digital Broadcast)	
Content Protection)	

**AMENDMENT TO CERTIFICATION OF
DIGITAL TRANSMISSION LICENSING ADMINISTRATOR LLC
FOR APPROVAL OF DTCP –BT AS AN
AUTHORIZED OUTPUT PROTECTION TECHNOLOGY**

The Digital Transmission Licensing Administrator, LLC ("DTLA"), pursuant to Order FCC 04-193 released August 12, 2004 ("Certification Order"), the Public Notice DA 04-145 issued by the Commission on January 23, 2004, and the regulations set forth at 47 C.F.R. § 73.9008, hereby submits an Amendment to its Certification concerning the use of the Digital Transmission Content Protection technology ("DTCP," also known as "the 5C technology") seeking approval for its digital output protection technology for Unscreened Content and Marked Content over the Bluetooth interface protocol ("DTCP-BT").

Introduction and Background

DTLA filed with the Commission on March 1, 2004, a Certification requesting approval of DTCP as a digital output protection technology. In its initial submission and in supplements thereto, DTLA provided the Commission with information concerning the mapping and use of DTCP for the following protocols: IEEE 1394, 1394-similar transports (including Op-iLink), USB, MOST, DTCP over Internet Protocol ("DTCP-IP") and Bluetooth.

In the Certification Order, the Commission approved the certification request submitted by DTLA with respect to DTCP over 1394 and 1394-similar transports and USB, and certified the use of DTCP-IP subject to submission of a final revised Specification incorporating the RTT-based localization elements set forth in the letters from DTLA to the Commission dated July 20 and 23, 2004. Certification Order ¶¶ 74, 78 and 108. With respect to DTCP-BT, the Commission held that it required additional technical information concerning the specifications of the Bluetooth protocol itself to reach a specific conclusion, and that “the mapping protocol for this implementation relies upon information contained in the Bluetooth technical specification which has not been submitted by DTLA for Commission review.” Certification Order ¶ 78 n. 333. The Commission’s Order stated that DTLA would be permitted to file an Amendment to its Certification with the additional information regarding the Bluetooth technology, and that the Commission would reevaluate the merits of DTCP-BT as if it were a new transport. *Id.*

DTLA subsequently has received permission from the Bluetooth SIG, Inc. to provide the Commission with additional information concerning the operation of Bluetooth. Therefore, DTLA submits this Amendment to its Certification to provide the Commission additional information concerning the Bluetooth protocol, and more specific explanation concerning the interrelationship of the Bluetooth specifications and the mapping of DTCP in the DTCP-BT Specification.

Certification

DTLA certifies that DTCP-BT provides effective protection for Unscreened Content and Marked Content against mass indiscriminate redistribution. DTLA incorporates herein by reference the information set forth in its March 1, 2004, Certification, describing the general operation of the DTCP technology, the level of protection afforded by DTCP, the extent to which

DTCP has been licensed and approved by manufacturers and content owners, the licensing terms and conditions applicable to DTCP, and the ways in which use of DTCP accommodates consumer use and enjoyment of digital broadcast content, and the Reply dated April 16, 2004. DTLA also incorporates by reference the additional ex parte submissions made by DTLA in the above-referenced docket.

DTLA further submits in support of this Amendment:

- DTCP Volume 1 Supplement C Revision 1.0, which had been submitted to the Commission in an ex parte filing in this docket dated June 24, 2004 (“DTCP-BT Specification”), and which is submitted again herewith for the convenience of the Commission (Attachment A);
- The Bluetooth “Core System” specification and compliance requirements (Attachment B); and
- The Audio/Video Distribution Transport Protocol Specification Version 1.0 (“AVDTP”) (Attachment C).

As with the other interface protocols to which DTCP is mapped, DTCP provides content protection capabilities for DTCP-BT. DTCP-BT does not rely on any security capabilities of the Bluetooth protocol itself. The DTCP-BT Specification maps the relevant DTCP EMI, CCI and AKE information to the formats as specified by the Bluetooth AVDTP, and states how additional information is carried using attributes of the Bluetooth protocol to indicate that DTCP protection is to be used.

More specifically, the Bluetooth protocol permits devices to signify that a device has content protection capability, using the “Service Capability” value at AVDTP 8.19. The identity of the supported content protection method is specified using a field denominated as “CP_Type”

at AVDTP 8.19.6. Section 5 of the DTCP-BT Specification states that the CP_Type assigned for DTCP is 0001₁₆. An example of the general Content Protection Procedure used by the Bluetooth protocol is set forth at Appendix C to the AVDTP. The “Security Control” procedure by which Bluetooth devices exchange content protection data is set forth at AVDTP ¶ 6.15. Commands and responses relating to security control for Bluetooth in general are set forth at AVDTP ¶¶ 8.16, 13.1.23 and 13.1.24.

The DTCP-BT Specification was reviewed by the two DTCP Content Participants, Sony Pictures and Warner Bros., and by the DTLA Adopters. Following such review, and having received no objections or adverse comments thereto, DTLA issued the DTCP-BT Specification as a final specification by DTLA on April 26, 2004. DTLA further notes that the Work Plan submitted by DTLA to the Commission in an ex parte filing dated June 1, 2004, also applies, *mutatis mutandis*, to DTCP-BT.

Conclusion

DTCP is a well-established, tested technology that provides effective protection against unauthorized redistribution of commercial audiovisual content, including digital terrestrial broadcast television. More than 90 companies have obtained licenses from DTLA for the use of DTCP, and the manufacture and resale of devices that incorporate DTCP. DTCP-BT provides the same level of effective protection for exchange of content between devices that use the Bluetooth interface protocol. DTLA respectfully submits that the additional information in this Amendment and Attachments A-C demonstrates that DTCP-BT satisfies the Commission requirements for the protection of Unscreened and Marked Content, and therefore merits approval of this Certification request.

Respectfully submitted,

/s/

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Dated: September 27, 2004

Certificate of Service

I hereby certify that on September 27, 2004, a copy of the foregoing Amendment To Certification Of Digital Transmission Licensing Administrator LLC For Approval Of DTCP-BT As An Authorized Output Protection Technology was served by first class mail, postage prepaid, upon the following persons. In light of the extremely voluminous nature of the Attachments, and that each of these Attachments is available from public sources, such Attachments will be made available by DTLA to these parties only upon request.

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